

MNeroes.txt

From: Michelle.Neroes@acs-inc.com%inter2 [Michelle.Neroes@acs-inc.com] on behalf of Michelle.Neroes@acs-inc.com
Sent: Friday, February 25, 2005 10:44 PM
To: Torres, Francine
Cc: Michelle.Neroes@acs-inc.com%inter2
Subject: Organic label for dairy cows

Attachments: ATTACHMENT.TXT

Good morning Mrs. Torres

I write to you about companies that are trying to use organic label about dairy cows without using organic guidelines. I urge you to support the following recommendations.

* That you support the recommendations from the National Organic Standards Board Livestock Committee from February 1, regarding pasture requirements

* That pasture is good for the health and welfare of cows and other ruminants, and it should not be dropped as a requirement from the organic standards

* That this requirement should be more enforced by the USDA.

Below are the draft guidelines released for public comment. The NOSB Livestock Committee recommends the following:

1. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide a significant portion of the total feed requirements. The Organic System Plan shall include a timeline showing how the producer will work to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: a) the amount of pasture provided per animal; b) the average amount of time animals are grazed on a daily basis; c) the portion of the total feed requirement that will be provided from pasture; d) circumstances under which animals will be temporarily confined; and e) the records that are maintained to demonstrate compliance with pasture requirements.

2. Temporary Confinement

Temporary confinement means the period of time when ruminant livestock are denied pasture. The length of temporary confinement will vary according to the conditions on which it is based (such as the duration of inclement weather), and instances of temporary confinement shall be the minimum time necessary. In no case shall temporary confinement be allowed as a continuous production system. All instances of temporary confinement shall be documented in the Organic System Plan and in records maintained by the operation.

Temporary confinement is allowed only in the following situations:

- a.. During periods of inclement weather, such as severe weather occurring over a period of a few days during the grazing season;
- b.. Conditions under which the health, safety, or well-being of an individual animal could be jeopardized, including to restore the health of an individual animal or to prevent the spread of disease from an infected animal to other animals;
- c.. To protect soil or water quality; or
- d.. During a stage of production. [For ruminants, a "stage of production" that warrants temporary confinement from pasture include: a) birthing; b) dairy animals

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up to 6 months of age; and c) beef animals during the final finishing stage, not to exceed 120 days. Lactation of dairy animals is not a stage of production under which animals may be denied pasture for grazing.]

Thank you, michelle Neroes

Michelle Neroes

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